

# EXHIBIT B

**BONI, ZACK & SNYDER LLC**

Benjamin J. Eichel (Attorney I.D. No. 307078)

beichel@bonizack.com

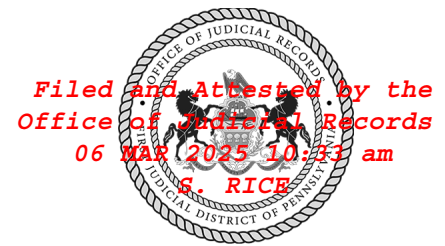
15 St. Asaphs Road

Bala Cynwyd, PA 19004

*Attorneys for Plaintiff Kindred Hospitals East, LLC*

*d/b/a Kindred Hospital – Philadelphia and Kindred*

*Hospital - Havertown*



KINDRED HOSPITALS EAST, LLC d/b/a  
KINDRED HOSPITAL – PHILADELPHIA  
and d/b/a KINDRED HOSPITAL – HAVERTOWN:

*Plaintiff*

vs.

KEYSTONE FAMILY HEALTH PLAN

*Defendant.*

**COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY,  
PENNSYLVANIA**

**DOCKET NO. 250200219**

**STIPULATION TO FILE AMENDED COMPLAINT**

WHEREAS, Plaintiff Kindred Hospitals East, LLC d/b/a Kindred Hospital – Philadelphia and d/b/a Kindred Hospital – Havertown (“Plaintiff” or “Hospital”) entered into that certain Hospital Services Agreement with Keystone Family Health Plan (“KFHP”), effective July 1, 2019 and as amended (“Agreement”).

WHEREAS, on January 31, 2025, Plaintiff filed the complaint in this action (“Complaint”).

WHEREAS, Plaintiff named Keystone First Insurance Group, LLC and Vista Health Plan, Inc. a/k/a Keystone Family Health Plan d/b/a Keystone First Community HealthChoices as defendants in the Complaint.

WHEREAS, following the filing of the Complaint, in connection with discussions as to waiver of service of the Complaint, counsel for KFHP informed Plaintiff of its view that KFHP was the sole and proper defendant as to the claims alleged in the Complaint. Counsel agreed to

accept service of the Complaint on KFHP's behalf once KFHP was identified as the sole defendant in this action.

**NOW, THEREFORE, IT IS HEREBY STIPULATED** by the parties, by and through their respective undersigned counsel, that pursuant to Pa. R. Civ. P. 1033(a), Keystone Family Health Plan consents to Plaintiff filing an amended complaint that identifies Keystone Family Health Plan as the sole defendant.<sup>1</sup> Keystone Family Health Plan reserves, and does not waive, all rights to file an Answer or Preliminary Objections in response to the Amended Complaint and the decision to accept service of the Amended Complaint does not constitute an admission of any of the allegations set forth in the Amended Complaint, nor does acceptance of service act as a waiver of any rights.

**IT IS SO STIPULATED.**

DATED: March 6, 2025

/s/ Benjamin J. Eichel  
BONI, ZACK & SNYDER LLC  
beichel@bonizack.com  
15 St. Asaphs Road  
Bala Cynwyd, PA 19004

William H. Mazur (*pro hac vice* forthcoming)  
Fultz Maddox Dickens PLC  
101 South Fifth Street, 27th Floor  
Louisville, KY 40202  
wmazur@fmdlegal.com

*Attorneys for Plaintiff Kindred Hospitals East, LLC  
d/b/a Kindred Hospital – Philadelphia and Kindred  
Hospital - Havertown*

Shane P. Simon  
Shane P. Simon  
Saul Ewing LLP  
Centre Square West  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102  
Telephone: (215) 972-7160  
shane.simon@saul.com

*Attorneys for Defendant Keystone Family Health Plan*

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<sup>1</sup> Plaintiff reserves the right to seek to add additional defendants at a later date should the discovery process uncover information making such an addition appropriate.